

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS'
CONCUSSION INJURY LITIGATION

Kevin Turner and Shawn Wooden, on behalf of themselves
and others similarly situated,

Plaintiffs,

v.

National Football League and NFL Properties LLC,
successor-in-interest to NFL Properties, Inc.,

Defendants.

No. 2:12-md-02323-AB

MDL No. 2323

Hon. Anita B. Brody

CIVIL ACTION NO: 2:14-cv-
00029-AB

THIS DOCUMENT RELATES TO:
ALL ACTIONS

**DECLARATION OF CHRISTOPHER A. SEEGER IN SUPPORT OF
CO-LEAD CLASS COUNSEL'S MOTION FOR AN INJUNCTION PROHIBITING
IMPROPER COMMUNICATIONS WITH THE CLASS BY
CLASS MEMBER, FRED WILLIS, THROUGH HIS ORGANIZATIONS,
NFL PLAYERS BRAINS MATTER™, HPN NEUROLOGIC®, AND
HPN CONCUSSION MANAGEMENT®, OR OTHERWISE**

Christopher A. Seeger declares, pursuant to 28 U.S.C. § 1746, based upon his personal knowledge, information and belief, the following:

1. Having been appointed as Co-Lead Class Counsel, I am fully familiar with the matters set forth herein, including the procedural history of this litigation and the class-wide settlement that this Court approved. I submit this Declaration in support of Co-Lead Class Counsel's Motion for an Injunction Prohibiting Improper Communications with the Class by Class Member, Fred Willis, through his Organizations, NFL Players Brains Matter™, HPN Neurologic®, and HPN Concussion Management®, or Otherwise.

2. Following the status conference held on Wednesday, February 8, 2017, I became aware that a Class Member, Fred Willis, had disseminated an email to the Retired Player community that contained many misrepresentations and outright falsehoods, which are described in detail in the Memorandum in support of Co-Lead Class Counsel's Motion. A true and correct copy of that email is attached hereto at Exhibit A. It is also available at <http://us3.campaign-archive2.com/?u=5970239c236f408d79ebacc7a&id=2e3f0bdbf6&e=d468cdfb8b>.

3. In response to becoming aware of that email, I also learned of Mr. Willis' several organizations and misrepresentations made on those organizations' websites.

4. Attached hereto as Exhibit B is a true and correct copy of the website content contained on the website for NFL Players Brains Matter™.

5. Attached hereto as Exhibit C is a true and correct copy of the website content for HPN Concussion Management®.

6. Attached hereto as Exhibit D is a true and correct copy of a compendium of information published by HPN Neurologic® and authored by Fred Willis and a member of Willis' Players Friendly Fast Track Team, George Rozelle, Ph.D., entitled, "2016 NFL Players & HPN High Performance Neurofeedback Study – Evaluating the Effectiveness of Ultra Low Power, Pulsed Electric Current EEG Biofeedback in Treating Symptoms of Repetitive Traumatic Brain Injury in Retired NFL Athletes," which purports to report on certain clinical trials.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: February 21, 2017

s/ Christopher A. Seeger
CHRISTOPHER A. SEEGER
Co-Lead Class Counsel